

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**Chapter 11 case No. 08-1355 (JMP)
(Jointly Administered)**

**LEHMAN BROTHERS HOLDINGS INC., et al.,
Debtors.**

Creditor:

Stanton, Edward III
edward.stanton@gmail.com

**CLAIMANT'S OBJECTION TO DEBTORS' ONE HUNDRED
SEVENTY-THIRD OMNIBUS OBJECTION TO CLAIMS (NO
LIABILITY EMPLOYEE CLAIMS)**

Claimant: Stanton, Edward III (claim No. 33549)

Classification and Amount: Unsecured: \$128,360.71 ("LBHI Claim")

Lehman Brothers Inc. Deferred Compensation Plan ("LDCP")

Objection: Edward C. Stanton III ("Claimant") holds a claim against Debtor Lehman Brothers Inc. ("LBI") in (Case No. 08-01420 (JMP)(SIPA), in the amount of at least \$128,360.71, claim No. 4639 (the "LBI Claim").

Prior to the filings of the bankruptcy cases of LBI and its parent Lehman Brothers Holdings Inc. ("Debtor"), the Debtor controlled LBI in all aspects of its operations. In connection therewith, Debtor caused LBI to operate with inadequate capital to maintain its operations. As a direct result thereof, LBI was forced to declare bankruptcy, lacked sufficient capital to pay Claimant the full amount of the LBI Claim and stopped payment of contracted LDCP annual amounts to Claimant. The Debtor, as the controlling parent is therefore responsible for the payment of all of LBI's claims, including, Claimant's LBI Claim. Therefore, Debtor's One Hundred Seventy-Third Omnibus Objection to Claims (No Liability Employee Claims), seeking to disallow and expunge the LBHI Claim, should be denied.

Dated: October 11, 2011

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